

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

BRADLEY ERHART,)	
)	
Plaintiff,)	
)	
v.)	No. 1:21-cv-01829-TAB-TWP
)	
NANCY ERHART,)	
)	
Defendant.)	

UNOPPOSED MOTION FOR EXTENSION OF DEADLINES

COMES NOW Defendant, Nancy Erhart, by counsel and for her unopposed motion for extension of deadlines would state:

1. Pursuant to this Court's orders, the deadline to complete non-expert witness discovery and discovery relating to liability issues is August 5, 2022. See Case Management Plan, dated September 29, 2021 ("CMP"); and Order on June 6, 2022, Telephonic Status Conference.

2. The deadline to file dispositive motions is August 10, 2022.

3. Discovery is ongoing.

4. Undersigned counsel recently appeared on behalf of Defendant and requires additional time to get up to speed on the case, respond to requests for discovery and issue necessary requests for discovery.

5. Counsel for Defendant has communicated with counsel for Plaintiff and there is no objection to the requested extensions.

6. Defendant respectfully requests that the deadline to complete non-expert witness discovery and discovery relating to liability issues be extended to October 4, 2022.

7. Defendant respectfully requests that the deadline to file dispositive motions be

extended to November 4, 2022.

8. That this motion is not being filed for hindrance or delay.

WHEREFORE, Defendant requests that this Court extend the deadlines to complete discovery and file dispositive motion, and for all other proper relief.

Respectfully Submitted,

EMSWILLER, WILLIAMS, NOLAND
& CLARKE, LLC

By: /s/ *Paul R. Sadler*

Paul R. Sadler, Counsel to Respondent
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CERTIFICATE OF SERVICE

I, Paul R. Sadler, an attorney, hereby certified that a true and correct copy of the above and foregoing document was electronically filed on July 5, 2022, with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the parties and attorneys of record.

/s/ *Paul R. Sadler*

Paul R. Sadler